

Attachment #1
INDUSTRIAL HAZARD WASTE
FOLDER LEVEL

WST IHW #: 31108

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JHW 31108

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: Central Records Files (MC - 199)
Union Carbide Corporation - Brownsville
Solid Waste Registration No. 31108

Date: October 1, 2005

mgr concurrence 1/10/2006
JHP

Thru: *JHP* *12/15/05* Ata-ur-Rahman, Manager
Corrective Action Section, Remediation Division

DRB Donald Boothby, Supervisor
Team I, Corrective Action Section, Remediation Division

From: Maureen Hatfield, P.G., Project Manager
Team I, Corrective Action Section, Remediation Division

RECEIVED

JAN 24 2006

Subject: Documentation of achievement of facility-wide remedy selection and remedy construction complete
EPA ID No. TXD008114092
Texas Hazardous Waste Permit No. HW-50318

TCEQ
CENTRAL FILE ROOM

Based on a file review, remedies have been selected for all units and areas of concern (AOCs) subject to RCRA/HSWA corrective action at the above-referenced facility. The RCRA milestone of facility-wide Remedy Decision (CA400)¹ has been achieved, based on the approval of the proposed remedy at Union Carbide Corporation's Brownsville main plant on April 23, 1996. Remedies had previously been selected for all other units and AOCs subject to corrective action at the facility.

In addition, the physical remedy construction has been completed facility-wide (CA550RC)². Achievement of this milestone is based on the approval of remedy completion at Union Carbide Corporation's Brownsville main plant on April 23, 1996. Remedy completion or construction had previously been approved for all other units and AOCs subject to corrective action at the facility. On May 26, 1996, Union Carbide received consent from the TCEQ on revocation of their Hazardous Waste Permit HW-50318.

The units and AOCs considered in this evaluation include:

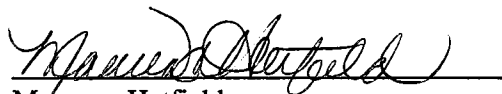
<u>RFI Units & AOCs subject to Corrective Action</u>	<u>Remedy Decision¹</u>	<u>Approval of Remedy Construction/Completion²</u>
AOC No. 1 Leaking Underground Storage Tank	11/13/1995 ³	11/13/1995 ³
AOC No. 2 Release from Tank 3202 Pump Station	07/27/1995 ³	04/23/1996 ³
AOC No. 4 Maintenance Storage Area	07/27/1995 ³	04/23/1996 ³
AOC No. 5 Tank 5201	07/27/1995 ³	04/23/1996 ³
Drainage Laterals	07/27/1995 ³	04/23/1996 ³
Facility 03 - Incinerator	05/18/1989 ³	04/23/1996 ³

Facility 04 - Tank 3326	05/19/1987 ³	03/27/1989 ³
Facility 05 - Tank 5211	05/20/1987 ³	03/29/1989 ³
General Facility Areas	07/27/1995 ³	04/23/1996 ³
HWMU 01- Ball Mill Residue Basin- EPA approved clean closure	09/24/1993 ³	09/24/1993 ³
Oily and Purple Soils	09/19/1994 ³	09/19/1994 ³
Q107/Q114 Sumps	09/19/1994 ³	09/19/1994 ³
SA AB - Pumphouse Oil Separator Sump	07/27/1995 ³	04/23/1996 ³
SA AD - Recovery Oil Separator Sump	07/27/1995 ³	04/23/1996 ³
SA AE - Recovery Sump	07/27/1995 ³	04/23/1996 ³
SA AF - Septic Tank No. 10	07/27/1995 ³	04/23/1996 ³
SA AG - Septic Tank No. 15	07/27/1995 ³	04/23/1996 ³
SA AH - Septic Tank No. 18	07/27/1995 ³	04/23/1996 ³
SA AI - Septic Tank No. 19	07/27/1995 ³	04/23/1996 ³
SA AJ - Septic Tank No. 21	07/27/1995 ³	04/23/1996 ³
SA AK - Shipping Sump	07/27/1995 ³	04/23/1996 ³
SA AM - Steel Mill Slag	07/27/1995 ³	04/23/1996 ³
SA AN - Surge Receiver	07/27/1995 ³	04/23/1996 ³
SA AU - Tank 3211	07/27/1995 ³	04/23/1996 ³
SA AV - Tank 3214	07/27/1995 ³	04/23/1996 ³
SA AW - Tank 4226	07/27/1995 ³	04/23/1996 ³
SA AY - Tank 4265	07/27/1995 ³	04/23/1996 ³
SA BA - Tank 5208	07/27/1995 ³	04/23/1996 ³
SA BB - Tank 5225	07/27/1995 ³	04/23/1996 ³
SA BE- Utility Sump	07/27/1995 ³	04/23/1996 ³
SA BF - Wacker Sump	07/27/1995 ³	04/23/1996 ³
SA BG - Waste Burner Sump	07/27/1995 ³	04/23/1996 ³
SA BI - No. 1 Reaction Caustic Tank	07/27/1995 ³	04/23/1996 ³
SA BJ - No. 2 Reaction Caustic Tank	07/27/1995 ³	04/23/1996 ³

SA BK -3210 Tank	07/27/1995 ³	04/23/1996 ³
SA CA - Catalyst Zone 58	07/27/1995 ³	04/23/1996 ³
SA CC - Paint Shop	07/27/1995 ³	04/23/1996 ³
SA CD - Main Substation Area	07/27/1995 ³	04/23/1996 ³
SA CE - PCB Transformers	07/27/1995 ³	04/23/1996 ³
SA CF - Purple Dirt Soil	09/19/1994 ³	09/19/1994 ³
SA CG - South Fire Training Area	11/13/1995 ³	04/23/1996 ³
SA D - Bullet Tank	07/27/1995 ³	04/23/1996 ³
SA K - Energy Oxygen Sump	07/27/1995 ³	04/23/1996 ³
SA L - Final Oil Separator Sump	07/27/1995 ³	04/23/1996 ³
SA M - Fire Pit Oil Separator Sump	07/27/1995 ³	04/23/1996 ³
SA N - Fire Pit Sump	07/27/1995 ³	04/23/1996 ³
SA P - Flare Pit	07/27/1995 ³	04/23/1996 ³
SA S - Main Office Septic Tank Sump	07/27/1995 ³	04/23/1996 ³
SA U - No. 1 Reaction Sump	07/27/1995 ³	04/23/1996 ³
SA V - No. 2 Reaction Sump	07/27/1995 ³	04/23/1996 ³
SWMU No. 05 -100 Acre Evaporation Pond No.1	07/27/1995 ³	04/23/1996 ³
SWMU No. 06 -100 Acre Evaporation Pond No.2	07/27/1995 ³	04/23/1996 ³
SWMU No. 07 -100 Acre Evaporation Pond No.3	07/27/1995 ³	04/23/1996 ³
SWMU No. 08 -100 Acre Evaporation Pond No.4	07/27/1995 ³	04/23/1996 ³
SWMU AA - Ponds of Non - UCC Origin	07/27/1995 ³	04/23/1996 ³
SWMU AC - Rial Car Loading Area	07/27/1995 ³	04/23/1996 ³
SWMU AL - Fuel Oil Spill Catch Pit	07/27/1995 ³	04/23/1996 ³
SWMU AQ - Tank 1251	07/27/1995 ³	04/23/1996 ³
SWMU AR - Tank 1301	05/22/1995 ⁶	05/22/1995 ⁶
SWMU AZ - Tank 4307 Area	07/27/1995 ³	04/23/1996 ³
SWMU B- Ball Mill Residue Dempsey Dumpster Loading Area and Truck Pad	09/24/1993 ³	09/24/1993 ³
SWMU BC - Bilge Water Holding Area	07/27/1995 ³	04/23/1996 ³

SWMU BR - Former Injection Well	10/20/1992 ³	10/20/1992 ³
SWMU E - Carbon Lake	07/27/1995 ³	04/23/1996 ³
SWMU F - Catalyst Zone 45	07/27/1995 ³	04/23/1996 ³
SWMU G - Catalyst Zones 82 through 92	07/27/1995 ³	04/23/1996 ³
SWMU H - Catalyst Zone 88	07/27/1995 ³	04/23/1996 ³
SWMU I - Disposal Pits	07/27/1995 ³	04/23/1996 ³
SWMU J - Drum Cleaning Area	07/27/1995 ³	04/23/1996 ³
SWMU O - Fire Training Area	07/27/1995 ³	04/23/1996 ³
SWMU Q - Garbage Area	07/27/1995 ³	04/23/1996 ³
SWMU R - Insulation Disposal Area	07/27/1995 ³	04/23/1996 ³
SWMU T - Mixed Acid/Residue Oil Pond	11/13/1995 ³	04/23/1996 ³
SWMU W - Non-UCC Ground Burner	07/27/1995 ³	04/23/1996 ³
SWMU X - Non-UCC Pond	07/27/1995 ³	04/23/1996 ³
SWMU Y - North Evaporation Pond	07/27/1995 ³	04/23/1996 ³
SWMU Z - Old Oil Skimmer Pits	01/20/1995 ³	01/20/1995 ³
Tank 1241	03/16/1995 ³	03/16/1995 ³

To date, no additional units subject to corrective action requirements have been identified at the facility.


Maureen Hatfield

cc: Waste Program Manager, TCEQ Region 15 Office, Harlingen

Notes:

¹ "The event when the state or EPA formally selects a remedy designed to meet RCRA Corrective Action long-term goals of protection of human health and the environment. This event code also applies when no further corrective action is required because stabilization measure(s) have already been implemented or because the site characterization has demonstrated the attainment of the long-term RCRA Corrective Action goals." See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approved remedy for this event code to apply facility-wide.

- ² “The event when the state or EPA acknowledges in writing that the RCRA facility has completed construction of a facility’s remedy that was designed to achieve long-term protection of human health and the environment, and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved. Remedy construction may also acknowledge the event where no remedy is constructed.” See RCRAInfo Data Dictionary for complete event code definition. Each unit and AOC must have an approval of the remedy construction or approval of the decision that no physical construction is needed for this event code to apply facility-wide.
- ³ Date confirmed through TCEQ correspondence review.
- ⁴ Date obtained from RCRAInfo database.
- ⁵ Date obtained from facility correspondence.
- ⁶ Date obtained from TCEQ database.

DO NOT SEND THIS PAGE¹

bcc list (format revised 9/15/2004):

Lila Beckley (copy for GPRA files).

~~Mr. Donald Boothby, Team I Supervisor, Corrective Action Section (MC-127)~~

~~Central Records (MC-199)~~

CAS files (MC-127)

For data entry:

WWC COMMUNICATION ID:	N/A
This letter is (Pick one):	IOM
 LBB (04 or 07, and number to count):	N/A
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Document Review(s) Complete? (Yes/No)	N/A
 WWC PROPERTY: CAS Status value changed for entire facility (Put new status or n/a) ² ?	N/A
 WWC FEATURE UPDATES (n/a, if not applicable) ³ :	N/A
Feature Name:	
New Feature Status:	N/A
 For entry into RCRAInfo: Number of units (n/a, if not applicable):	Entire Facility
Corrective Action Codes (RFI units/areas) CA- or	CA400, CA-550 and CA-999
Closure Codes (RCRA/Interim Status units) CL-	

1. Only attach bcc page to the writer's copy and CAS File copy.
2. If facility will no longer be part of workload, change IHW CA 0 Fea status to Complete or Transferred, verify there are no ongoing PM-defined Features, and verify there are no outstanding Communications that need review.